

EXHIBIT P

From: Steven S. Biss <stevenbiss@earthlink.net>

Sent: Friday, January 24, 2020 1:38 PM

To: Carome, Patrick <Patrick.Carome@wilmerhale.com>

Cc: Chuck Seyfarth <CSeyfarth@ohaganmeyer.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>

Subject: Re: Subpoena to Twitter in Fitzgibbon v. Radack

EXTERNAL SENDER

Pat,

Agreed that the deadline for Twitter to respond to the subpoena is extended to 2/3. As I said, my trial is in July and the discovery cut-off is in early March. I am not willing to extend the deadline further, especially since I expect nothing but objections from Twitter, which we will need to take up immediately with Judge Payne.

Radack???s communications with the user or users of @DevinCow is relevant, *inter alia*, to the issue whether she breached the settlement agreement at issue. Here is the photograph of Radack in the cow costume:



unRADACKted @JesselynRadack · 1h

@DevinCow Thank you for making me laugh harder this week than all year!
You're divine. I mean, bovine.



1



2



7



Radack has been in constant contact with @DevinCow since Trevor Fitzgibbon filed suit. Here is the latest classy tweet:



Devin Nunes' cow 🐄 @DevinCow · Jan 20



LeiliHana @JumzyRau · Jan 20

Replying to @DevinCow and @DamonMPA

Did you squirt milk out of your udder on Nunes, Cow?!?!

91

127

926



unRADACKted
@JesselynRadack

Replying to @DevinCow

Facial.

9:00 AM · Jan 20, 2020 · Twitter for iPhone

Upon receipt of Twitter???s objections, I will call you for a meet and confer ahead of the discovery conference with the Court.

Call or email me if you have any questions.

From: Carome, Patrick

Sent: Friday, January 24, 2020 1:05 PM

To: Steven S. Biss

Cc: Chuck Seyfarth ; Holtzblatt, Ari

Subject: RE: Subpoena to Twitter in Fitzgibbon v. Radack

Steven,

Thank you for taking our call and speaking with me and Ari a few minutes ago. This email confirms that in our call you agreed to extend the return date of the above-referenced subpoena by seven days, making the new return date February 3, 2020; and that you also agreed that Twitter's time to serve objections to the subpoena pursuant to Rule 45(d)(2)(B) is also extended to that same date (February 3, 2020). Please let us know immediately if this is not correct. Thank you for this modest accommodation.

Regards,

Patrick J. Carome | WilmerHale

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From: Carome, Patrick

Sent: Friday, January 24, 2020 10:59 AM

To: 'Steven S. Biss' <stevenbiss@earthlink.net>

Cc: Chuck Seyfarth <CSeyfarth@ohaganmeyer.com>; Ari Holtzblatt (Ari.Holtzblatt@wilmerhale.com)
<Ari.Holtzblatt@wilmerhale.com>

Subject: Subpoena to Twitter in Fitzgibbon v. Radack

Hi Steven,

We would like to speak with you ASAP regarding the subpoena you purported to issue to Twitter under the auspices of the Fitzgibbon v. Radack case. When would you be available to do that?

Regards,

Pat

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